

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)
IMPLANT PRODUCTS LIABILITY) MDL NO. 2272
LITIGATION)
)
) Master Docket Case No. 1:11-cv-05468
)
This Document Relates to:) Honorable Rebecca Pallmeyer

William Colbert et al. v. Zimmer, Inc., et al.,
Eastern District of Pennsylvania, Case No. 2:12-cv-01335-JS

STIPULATION TO EXTEND TIME TO FILE REPLY IN
SUPPORT OF MOTION FOR SUGGESTION OF REMAND: COLBERT

The plaintiffs and the Zimmer Entities¹ (together, the "Parties") jointly stipulate and agree to a brief extension of time, to and including September 19, 2012, for the Zimmer Entities to file their reply in support of their Motion For Suggestion Of Remand: *Colbert*. In support of this Stipulation, the Parties state as follows:

1. The Zimmer Entities filed their Motion For Suggestion Of Remand: *Colbert* ("Motion To Remand") on August 8, 2012.
2. On August 21, 2012, the Parties stipulated to the entry of an extended briefing schedule for the Motion To Remand. The plaintiffs responded to the Motion To Remand on September 7, 2012.
3. The Zimmer Entities' reply in support of their Motion To Remand is currently due on September 14, 2012, which time has not expired.
4. No prior extension of time has been requested by the Zimmer Entities.

¹ For purposes of this stipulation, "Zimmer Entities" includes the following defendants in this action: Zimmer, Inc., Zimmer Holdings, Inc., and Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc.

5. The Zimmer Entities state that this Stipulation is not made for the purpose of undue delay.

Accordingly, the Zimmer Entities respectfully request that the Court enter this Stipulation and grant the stipulated extension, to and including September 19, 2012, for the Zimmer Entities to file their reply in support of their Motion To Remand.

By /s/ Tobias L. Millrood
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Attorney for the defendants, Zimmer, Inc.,
Zimmer Holdings, Inc., and Zimmer Surgical,
Inc., f/k/a Zimmer Orthopaedic Surgical
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CERTIFICATE OF SERVICE

I certify that on September 14, 2012, a copy of the foregoing Stipulation To Extend Time To File Reply In Support Of Motion For Suggestion Of Remand: *Colbert* was filed electronically. Parties may access this filing through the Court's system.

/s/ Joseph H. Yeager, Jr.